

## County of Los Angeles CHIEF EXECUTIVE OFFICE

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June 26, 2009

Dennis Quilliam
City Planner
Los Angeles World Airports
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

Dear Mr. Quilliam:

## COUNTY OF LOS ANGELES COMMENTS REGARDING LAX TOM BRADLEY INTERNATIONAL TERMINAL RECONFIGURATION PROJECT

The County of Los Angeles (County) has reviewed the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Tom Bradley International Terminal (TBIT) Reconfiguration Project, also referred to as the Bradley West Project. Consistent with the California Environmental Quality Act (CEQA), our comments on the Bradley West Project are presented below.

- 1. USE OF LAX MASTER PLAN FINAL ENVIRONMENTAL IMPACT REPORT (EIR): The Bradley West DEIR is a project-level assessment that is tiered from and based upon the program-level information contained in the 2004 Final EIR. It refers to the 2004 EIR as a fully-certified and legitimate framework for subsequent LAX Master Plan activities. Although the EIR references the settlement agreement (p. 1-9), it does so in terms of the petitioners' challenge to the approval of the Master Plan program; the EIR is silent on the petitioners' challenge to the adequacy of the Master Plan EIR. The County has consistently noted the LAX Master Plan Final EIR is fundamentally flawed and should not be used as the basis for concluding that issues have previously been examined.
- 2. SAFETY AND SECURITY: The Bradley West DEIR does not evaluate safety and security for neighborhoods surrounding LAX.
- 3. **TRANSPORTATION:** The DEIR does not address improvements that have previously been recommended by the County, including direct airport access from the I-105 Freeway and an interchange at I-405 Freeway and Lennox Boulevard, nor does it reference the County-recommended development of a Master Transportation Improvement Plan with phasing and monitoring elements.

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- 4. LAND USE PLANNING: The DEIR does not acknowledge the Airport Land Use Commission finding that the LAX Master Plan is inconsistent with the County Land Use Plan. In fact, the DEIR states in Table 1-3 that there is no conflict between the project and any applicable plan or policy.
- **5. STRATEGIC REGIONALIZATION:** The DEIR does not address LAWA's obligation to spearhead regional distribution of air traffic demand.

Thank you for this opportunity to comment on this project.

Sincerely,

WILLIAM T FUJIOKA Chief Executive Officer

WTF:ES:MKZ FC:JR:pg

c: Each Supervisor

Acting County Counsel Director of Public Works Director of Public Health

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